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CLOSURE PLAN

THE STANLEY WORKS
1309 CORBIN AVENUE
NEW BRITAIN, CONNECTICUT

CTD 010170363

HRP #RC-STN-C

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HAZARDOUS WASTE CLOSURE PLAN

The Stanley Works
New Britain, Connecticut

CTD 010170363
HRP #RC-STN-C

1.0 CLOSURE REQUIREMENTS

In accordance with RCRA regulations contained in 40 CFR Parts 265.111 through 265.115 (General Closure Requirements) and State of Connecticut Hazardous Waste Regulations Section 22a-449(c)-29, all owners and operators of hazardous waste facilities must close their facilities in a manner that:

- Minimizes the need for further maintenance;
- Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and
- Complies with the closure requirements of this subpart including, but not limited to, the requirements of §§ 265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381 and 265.404.

The Closure Plan must include at a minimum:

1. A description of how each hazardous waste management unit at the facility will be closed in accordance with §265.111;
2. A description of how final closure will be conducted in accordance with § 265.111. The description must identify the maximum extent of the operation which will be unclosed during the active life of the facility;

3. An estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility and a detailed description of the methods to be used during partial and final closure, including, but not limited to methods for removing, transporting, treating, storing or disposing of all hazardous waste, identification of and the type(s) of off-site hazardous waste management unit(s) to be used, if applicable;
4. A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of decontamination necessary to satisfy the closure performance standards;
5. A detailed description of other activities necessary during the partial and final closure period to ensure that all partial closures and final closure satisfy the closure performance standards, including, but not limited to, ground water monitoring, leachate collection, and run-on and run-off control;
6. A schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include, at a minimum, the total time required to close each hazardous waste management unit and the time required for intervening closure activities which will allow tracking of the progress of partial and final closure; and
7. An estimate of the expected year of final closure for facilities that use trust funds to demonstrate financial assurance under § 265.143 or § 265.145 and whose remaining operating life is less than twenty years, and for facilities without approved closure plans.

The procedures outlined in this plan are to be followed for the closure of The Stanley Works long-term (greater than 90 days) Hazardous Waste Container Storage Area (Building 420).

The hazardous waste storage area is undergoing closure so that The Stanley Works may reclassify its New Britain Facility to a Generator of hazardous waste. As a Generator, The Stanley Works will utilize Building 420 for short-term (less than 90 days) storage of hazardous wastes.

2.0 DESCRIPTION OF FACILITIES

The Stanley Works, located in New Britain, Connecticut, is involved with the manufacturing of hand tools and hardware. The facility is comprised of numerous buildings which house all manufacturing, storage, and administrative operations. Figure 1 provides information on the site location and Figure 2 provides details on the facility layout.

From Stanley's operations, various wastes which are classified as hazardous wastes under the Resource Conservation and Recovery Act (RCRA) are generated on-site. Building 420 is used for the long-term storage (greater than 90 days) of containerized hazardous wastes. All wastes are stored in 55-gallon drums, except for metal hydroxide sludge (hazardous waste) and grinding sludge (non-hazardous waste), which are stored in 20-cubic yard dumpsters, and oils and coolants which are stored in above-ground tanks.

Building 420 is a single-story, concrete slab building constructed in 1946. This building was originally constructed for splitting steel and subsequently used for steel storage. In 1983, the building was converted for use as a hazardous waste storage area.

Stanley Works notified as a Storage and Treatment facility on August 14, 1980 (see Appendix A). Included in this notification were treatment operations (Building 30, Hardware Waste Treatment, and Building 431, Tools Waste Treatment) which met the

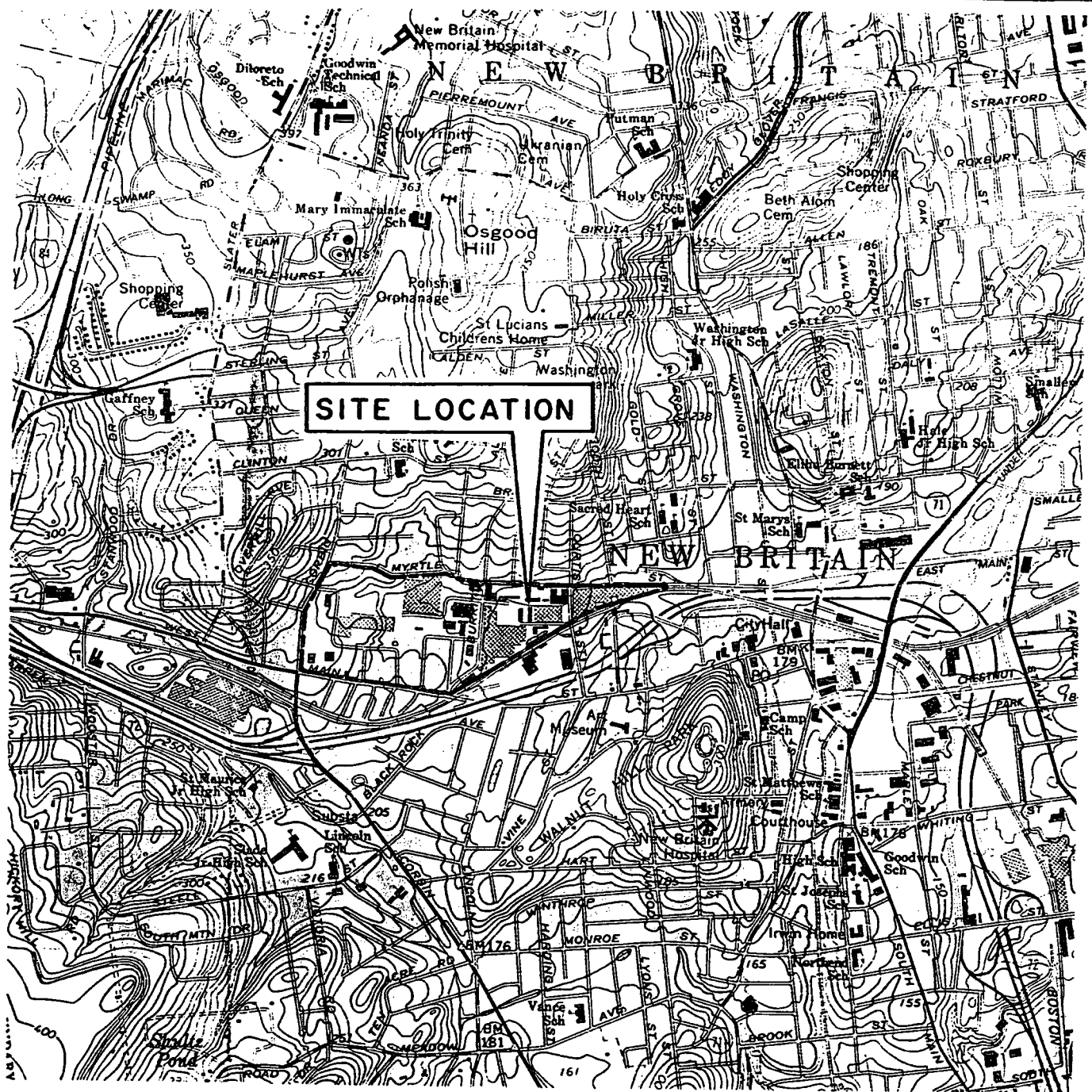
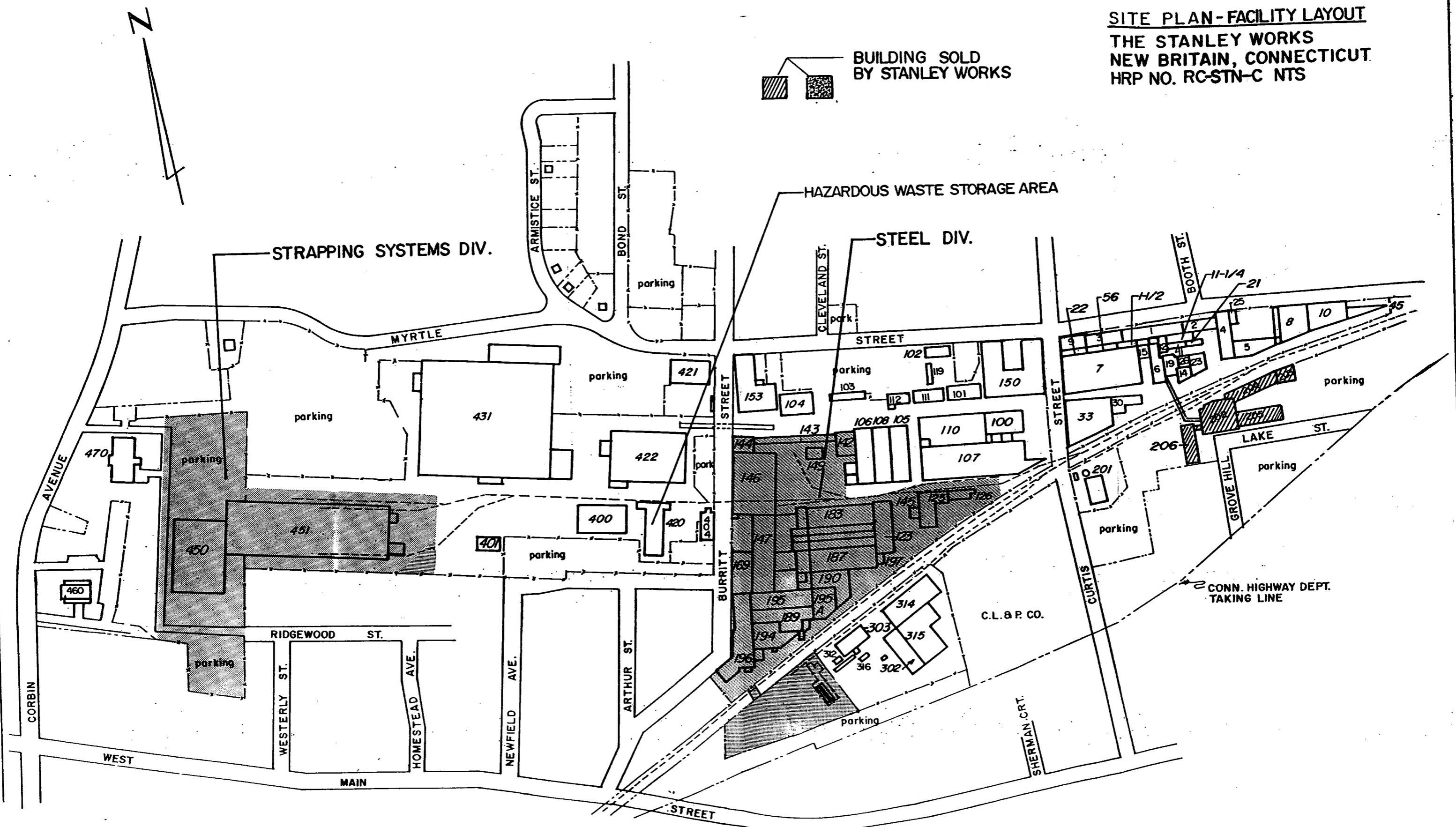


FIG. 1
 SITE LOCATION
 THE STANLEY WORKS
 NEW BRITAIN, CT.
 HRP RC-STN-C

FIGURE 2

SITE PLAN - FACILITY LAYOUT
THE STANLEY WORKS
NEW BRITAIN, CONNECTICUT
HRP NO. RC-STN-C NTS



definitions of "elementary neutralization unit" and "wastewater treatment unit". The Connecticut Department of Environmental Protection was notified by letter (see Appendix B) of the erroneous inclusion of these treatment units in the Part A notification.

The Part A notification also identified an outside storage area located behind Buildings 400 and 401. This area was closed under Consent Order Number HM-72 (see Appendix C). Building 420 was subsequently commissioned for use as the long-term (greater than 90 days) hazardous waste storage area and is the only area addressed in this Closure Plan.

3.0 CLOSURE PLAN FOR HAZARDOUS WASTE STORAGE AREA (Building 420)

- EPA Identification Number: CTD010170363
- Owner/Operator: The Stanley Works
- Plant Telephone: (203) 225-5911
- Mailing Address: 1309 Corbin Avenue
New Britain, Connecticut

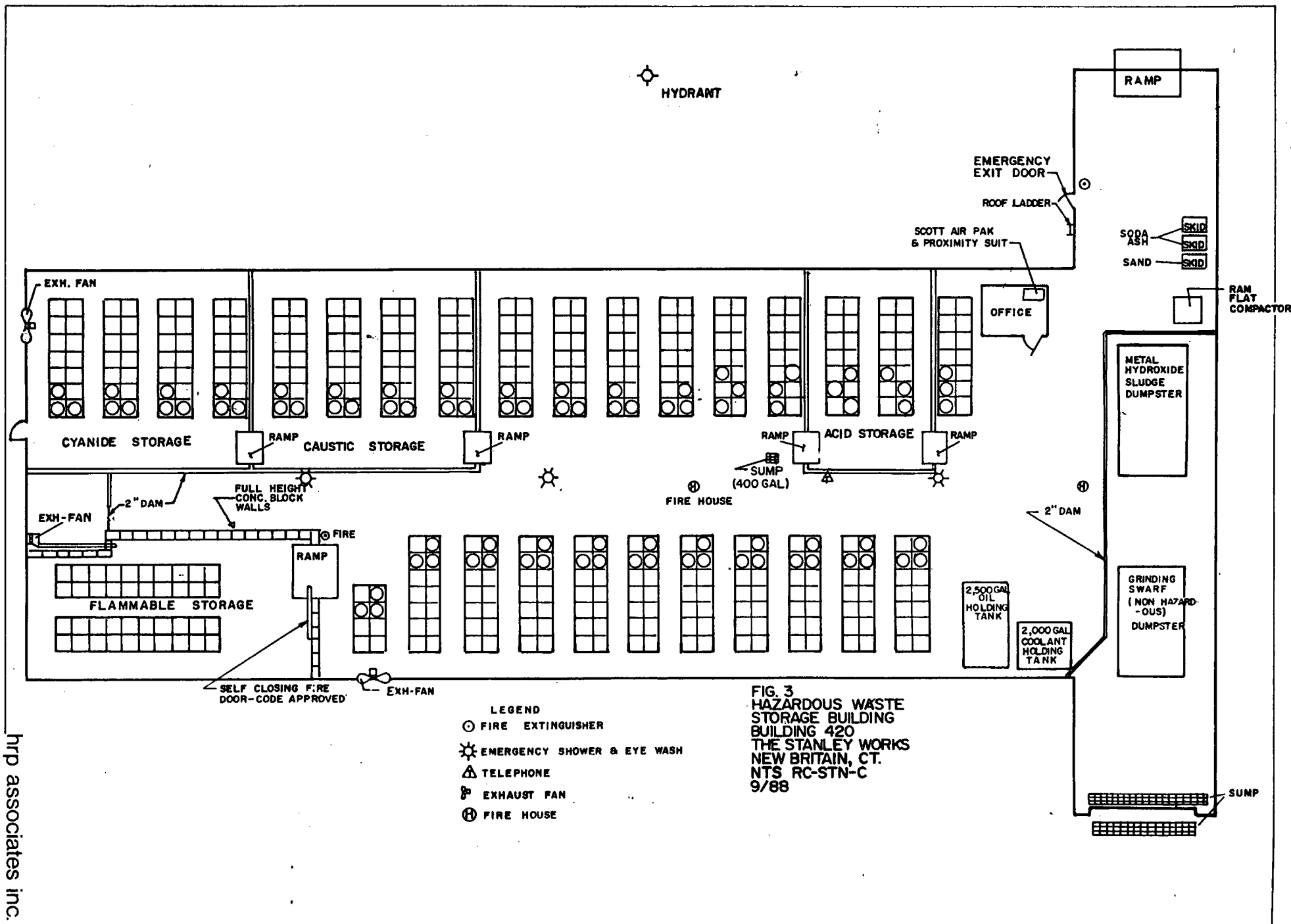
3.1 Facility Operation

The hazardous waste container storage area, Building 420 is located west of Burritt Street (see Figure 2). Construction of this one-story building consists of a poured concrete floor with hard tile walls. Entry into this building is provided by two (2) overhead doors and two (2) emergency exits.

This 12,400 square foot building has been set up to provide proper aisle spacing and maximize storage potential. The building's maximum capacity is 1092, 55-gallon drums, 2-20 cubic yard dumpsters, 1-2500 gallon above-ground holding tank, and 1-2000 gallon above-ground holding tank (see Figure 3).

The barrel storage area has been provided with wooden berms to segregate acids, caustics, and cyanide wastes.

Within the building, a 950 square foot brick/block enclosure with a self-closing fire door is used for the storage of flammable wastes. This area is provided with ventilation to prevent the build up of flammable vapors.



3.2 Wastes Inventory

The type of wastes and their corresponding EPA waste codes that have been handled in the hazardous waste storage area are shown on Table 3.1. Based upon the building set-up, the maximum quantity of hazardous waste stored in Building 420 has been determined to be 1092, 55-gallon drums and one (1), 20-cubic yard dumpster. The grinding sludge, oil and coolant are classified as Connecticut Regulated Wastes (non-hazardous).

3.3 Closure Procedure

To decontaminate the Hazardous Waste Storage Area (Building 420), the closure procedures described in this section will be carried out. Building 420 will continue to be used as a short-term (less than 90 days) storage area. All wastes stored at this facility greater than ninety (90) days have been shipped off-site for final disposal/treatment at a permitted hazardous waste facility.

To keep the disruption of plant operations at a minimum, the building will be decontaminated in three (3) stages. The building will be divided into three (3) sections as shown on Figure 4 and cleaned according to the procedures listed below:

TABLE 3.1

WASTE INVENTORY

The Stanley Works
New Britain, Connecticut

<u>WASTE</u>	<u>EPA HAZARDOUS WASTE CODE</u>
Ignitable Waste	D001
Corrosive Waste	D002
Reactive Waste	D003
Barium Contaminated Waste	D005
Cadmium Contaminated Waste	D006
Chromium Contaminated Waste	D007
Lead Contaminated Waste	D008
Selenium Contaminated Waste	D010
Spent Halogenated Solvents Used in Degreasing	F001
Spent Halogenated Solvents	F002
Spent Non-Halogenated Solvents	F003
Spent Non-Halogenated Solvents	F005
Wastewater Treatment Sludges from Electro- plating Operations	F006
Spent Cyanide Plating Bath Solutions	F007
Plating Bath Residues (cyanides)	F008
Spent Stripping & Cleaning Bath Solutions	F009
Quenching Bath Residues (cyanides)	F010
Spent Cyanide Solutions	F011
Spent Pickle Liquor	K062
Copper Cyanide	P029
Cyanides, not otherwise specified	P030
Sodium Cyanide	P106
Formaldehyde	U122
Methyl Ethyl Ketone	U159
Methyl Isobutyl Ketone	U161
Tetrachloroethylene	U210

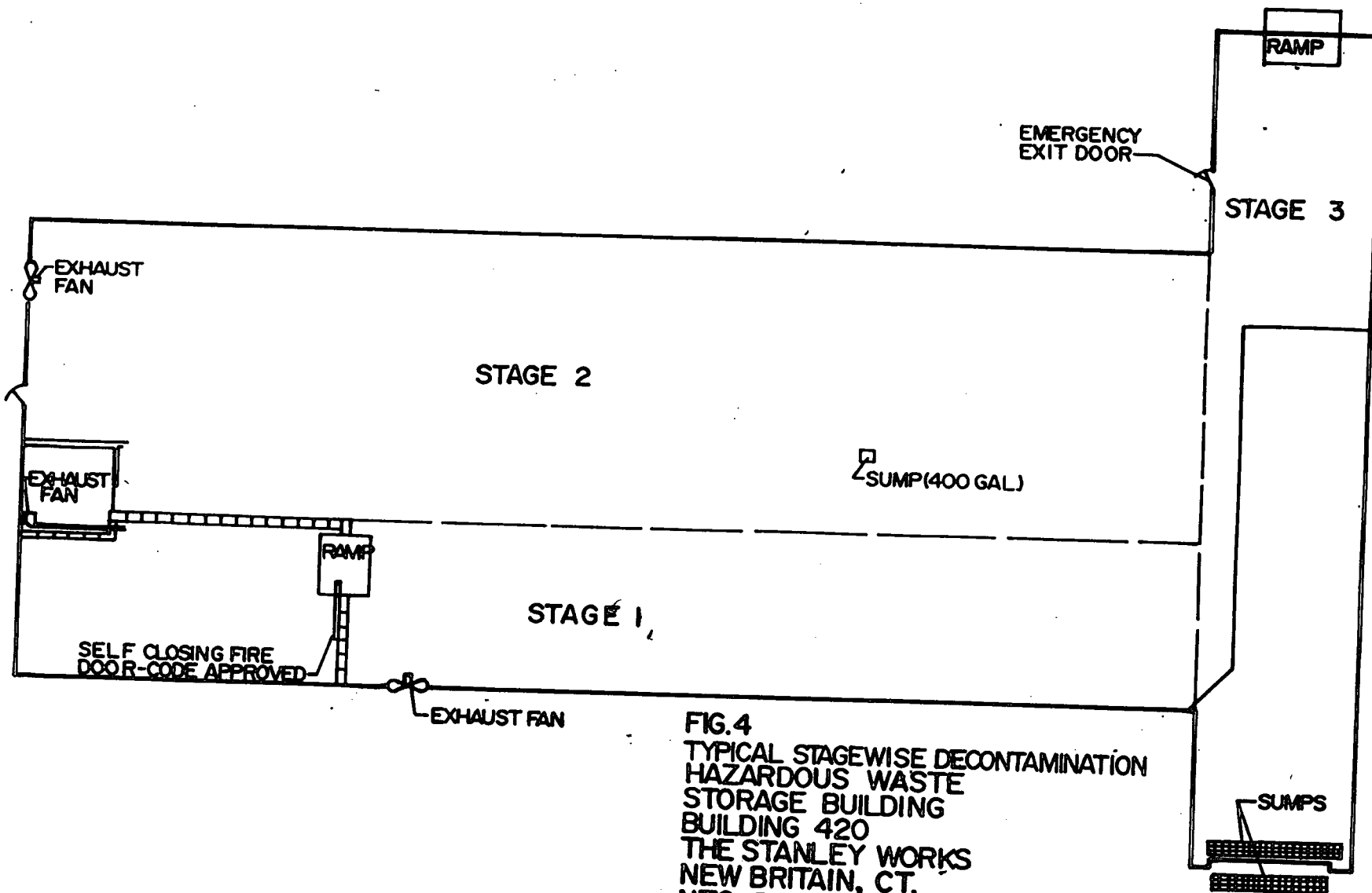


FIG. 4
TYPICAL STAGewise DECONTAMINATION
HAZARDOUS WASTE
STORAGE BUILDING
BUILDING 420
THE STANLEY WORKS
NEW BRITAIN, CT.
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- Step 1: To remove any loose dirt or dust, a dry vacuum will be used. All dirt/dust collected in this operation will be placed in a 55 gallon drum and disposed of at a permitted facility.
- Step 2: Any wooden segregation berms will be removed, cut up and placed into 55-gallon drums for disposal at a permitted facility.
- Step 3: To remove any hazardous constituents which may have contaminated the concrete floor, a high pressure steam cleaner will be used. An alkaline industrial cleaner which is phosphate free will be used with the steam cleaner.
- Step 4: The cleaning water generated in Step 3 will be collected using a wet vacuum and placed in 55-gallon drums. The cleaning water will be analyzed as described in Sections 3.6.A and 3.6.B to determine its classification (hazardous or non-hazardous).
- Step 5: If the results of the cleaning water analysis indicate that the rinsewater is a hazardous waste, Steps 3 and 4 will be repeated until the cleaning water is non-hazardous. All cleaning water will be disposed of off-site at a permitted facility.
- Step 6: The vacuum used to collect loose dirt and the cleaning water will be decontaminated using the high pressure washer. The vacuum will be triple rinsed and the rinseate disposed of with the cleaning waters generated from cleaning the floor.
- Step 7: All contaminated personal protection equipment and spill containment equipment will be barrelled and sent off-site as a hazardous waste to a permitted facility.

Spill control equipment consisting of absorbent (i.e. speedi-dry), brooms and shovels will be available in the event of any spills resulting from the above described decontamination process. All waste generated during the closure of the hazardous waste storage area

(i.e. brooms, absorbent, accumulated solids and rinse waters) will be manifested and shipped off-site by a licensed waste hauler for treatment/disposal at a permitted facility.

The quantity of rinsewater and dust/dirt wood generated in the decontamination of the storage area are estimated to be 275 gallons and 150 pounds, respectively. Contaminated personal protective equipment generated during closure is estimated to amount to 50 gallons.

3.4 Personnel Protection

To prevent disruption of plant operations, decontamination will be conducted in three (3) stages. During the decontamination operations, all unnecessary personnel will be restricted from Building 420.

All closure work will be supervised and performed using qualified off-site personnel. Personnel will be equipped with plastic coated tyveks, neoprene-coated gloves, solvent resistant boots, safety glasses and head protection. Both the wrists and ankles will be taped to protect against upward and inward splash. Disposable protective equipment such as the tyveks, gloves and boots will be collected in a 55 gallon drum for disposal at a permitted facility.

Air monitoring for organic vapors will be conducted utilizing an H-Nu organic vapor analyzer. If elevated levels of organics are detected, full face cartridge-type respirators equipped with organic vapor cartridges will be utilized by clean-up personnel.

3.5 Closure Performance Standards

In order to meet the closure performance standard for the hazardous waste storage area, all hazardous waste and hazardous residues must be removed to health and environmental based standards for all exposure pathways. The three exposure pathways are inhalation, dermal contact and ingestion.

The health based standards are chemical and pathway specific. As such, it was necessary to identify all Appendix VIII, Section 261.40 CFR hazardous constituents which may be present. This was accomplished through a thorough search of processes and materials used on-site. Presented as Table 3.5.1 are the hazardous constituents identified at The Stanley Works.

The hazardous constituents suspected of being present (Table 3.5.1) have been evaluated to identify the exposure pathways of concern (i.e. inhalation, dermal contact or ingestion). The pathways of concern identified for all the hazardous

TABLE 3.5.1

HAZARDOUS CONSTITUENTS

The Stanley Works
New Britain, Connecticut

<u>Hazardous Constituent</u>	<u>TLV¹</u> <u>(ppm)</u>	<u>MCL^{2**}</u> <u>(mg/l)</u>	<u>RFD³</u> <u>(mg/l)</u>	<u>RSD⁴</u> <u>(mg/l)</u>
Antimony	0.5 mg/m ³	---	0.01	---
Barium	0.5 mg/m ³	1.0	2	---
Cadmium	0.05 mg/m ³	0.01	---	---
Chromium	0.5 mg/m ³	0.05	0.2	---
Cyanide	5 mg/m ³	---	0.7	---
Copper	1 mg/m ³	15	---	---
Lead	0.05 mg/m ³	0.05	---	---
Mercury	0.05 mg/m ³	0.002	0.07	---
Nickel	1 mg/m ³	---	0.5	---
Selenium	0.2 mg/m ³	0.01	---	---
Silver	0.01 mg/m ³	0.05	0.1	---
Zinc	10 mg/m ³	55	---	---
Benzene	10	0.005	---	---
Chlorobenzene	75	---	1	---
1,1,2-Trichloro - 1,1,1-trichloroethane	1000	---	---	---
Trichlorofluoromethane	1000	---	---	---
Chloroform	10	---	0.4	0.0059 ⁷
Cresols*	5	---	---	---
O-dichlorobenzene	50	---	3	---
M-dichlorobenzene	---	---	---	---
Diethylphthalate	5	---	460	---
Dimethylphthalate	5	---	---	---
2-ethoxyethanol*	5	---	---	---
Ethylbenzene	100	---	4	---
Formaldehyde	3	---	---	---
Isobutyl Alcohol	100	---	---	---
Methylene Chloride	100	0.025 ⁶	---	---
Methyl Ethyl Ketone	200	1 ⁶	2	---
Methyl Isobutyl Ketone	50	---	2	---
Napthalene	10	---	---	---
2-nitropropane	10	---	---	---
Phenol*	5	---	1	---
Polychlorinated biphenyls*	0.5	.001 ⁶	---	---
Pyridine	5	---	0.04	---
Saccharin	---	---	---	---
Tetrachloroethylene	50	.02 ⁶	0.7	0.0067 ⁷
Toluene	100	1 ⁶	10	---
1,1,1-Trichloroethane	350	0.2	3	---
Trichloroethylene	50	0.005	---	0.0031
Xylene	100	70	---	---

TABLE 3.5.1 (continued)

- 1 Threshold Limiting Value, "NIOSH Pocket Guide to Chemical Hazards",
U.S. Department of Health and Human Services, September, 1985
- 2 EPA Maximum Contaminant Levels
- 3 EPA Verified Reference Doses
- 4 EPA Risk-Specified Doses
- 5 Secondary Drinking Water Standard
- 6 Connecticut Department of Health Services Action Levels (DOHSAL's)
- 7 Constituent is considered a carcinogen by the ingestion route.

* Dermal contact exposure pathway

** MCL's have been finalized for only a few chemicals. For compounds without MCL's, recommended MCL's, DOHSAL's, and National Secondary Drinking Water Standards have been used instead.

constituents are by inhalation and ingestion. Compounds which pose a dermal exposure pathway have been indicated by an asterisk.

Health-based levels have been included for the different exposure pathways. For the inhalation and dermal pathways, the threshold limiting values (TLV's) are the health-based standards. For the ingestion pathway, the maximum contaminant level (MCL*), verified referenced dose (RFD) and risk-specific dose (RSD) are the health-based standards.

The health based standards on Table 3.5.1 will be used as the closure performance standards. Sampling and analysis will be conducted as described in Section 3.6 to determine if the closure performance standards have been met.

3.6 Sampling and Analysis

A detailed description of the steps necessary to decontaminate the hazardous waste storage area has been provided in Section 3.3. Methods for sampling and testing to satisfy the closure performance standards are described below. Sampling procedures are discussed for the rinse waters, concrete base of the storage area and the ambient air.

*Maximum contaminant levels have been finalized for only a few chemicals. For compounds without MCL's, recommended MCL's, CT Department of Health Services Action Levels and National Secondary Drinking Water Standards have been used instead.

A. Sampling Procedures for Rinse Waters

The rinse waters generated from the closure of the hazardous waste storage area will be sampled in the following manner:

- 1a. Using a clean glass thief, each 55-gallon drum will be sampled in a vertical manner along its entire length from top to bottom.
- 1b. Using a clean plastic scoop, a screening sample of the most recent rinse water will be scooped off the base of the hazardous waste storage area.
2. Samples will be placed into the appropriate container and preserved as shown on Table 3.6.1.
3. Samples will be submitted to a certified laboratory for analyses accompanied by a signed Chain of Custody (see Appendix D).

B. Testing Procedures for Rinse Waters

The testing procedures to be followed by the certified laboratory when analyzing the rinse samples are shown on Table 3.6.2.

C. Sampling Procedures for Concrete

The hazardous waste storage area has a concrete base. Due to the porous nature of concrete, samples of the concrete will be collected and analyzed to determine if the closure performance standards have been met.

TABLE 3.6.1

SAMPLE COLLECTION/PRESERVATION REQUIREMENTS¹

The Stanley Works
New Britain, Connecticut

<u>Parameter</u>	<u>Container²</u>	<u>Preservation</u>	<u>Maximum Holding Time</u>
Flash Point	Plastic or glass w/screw type lids	Cool to 4°C	None listed
pH	Plastic or glass w/screw type lids	None required	Analyze immediately
Volatile Organics	glass w/teflon lined cap	Cool to 4°C	40 days after extraction
Metals	plastic or glass w/screw type lids	HNO ₃ to pH<2	6 months

1. Test Methods for the Evaluation of Solid Wastes Physical/Chemical Methods, EPA. SW-846, 3rd edition, November, 1986.
2. Teflon cap liners are to be used with glass containers.

TABLE 3.6.2

METHODS OF ANALYSIS FOR RINSE WATERS

The Stanley Works
New Britain, Connecticut

<u>Parameter</u>	<u>Test Method</u>	<u>Recommended¹ Analytical Method</u>
pH	Probe	9040 ¹
Flashpoint	Pensky-Martin Closed Cup	1010 ¹
Antimony	Atomic Absorption	7040, 7041 ¹
Barium	Atomic Absorption	7080, 7081 ¹
Cadmium	Atomic Absorption	7130, 7131 ¹
Chromium	Atomic Absorption	7190, 7191 ¹
Copper	Atomic Absorption	7210 ¹
Cyanide	Colormetric	9010, 9012 ¹
Lead	Atomic Absorption	7420, 7421 ¹
Mercury	Atomic Absorption	7470, 7471 ¹
Nickel	Atomic Absorption	7520 ¹
Selenium	Atomic Absorption	7740, 7741 ¹
Silver	Atomic Absorption	7760, 7761 ¹
Zinc	Atomic Absorption	7950 ¹
Benzene	Gas Chromatography/ Mass Spectrometry	8020/8240 ¹
Chlorobenzene	Gas Chromatography/ Mass Spectrometry	8020/8240 ¹
1,1,2-Trichloro- 1,2,2-Trifluoro- ethane	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Trichlorofluoro- methane	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Chloroform	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Cresols	Gas Chromatography/ Mass Spectrometry	8040, 8250, 8270 ¹
O-Dichlorobenzene	Gas Chromatography/ Mass Spectrometry	8020, 8240 ¹
M-Dichlorobenzene	Gas Chromatography/ Mass Spectrometry	8020, 8240 ¹
Diethylphthalate	Gas Chromatography/ Mass Spectrometry	8060, 8270 ¹
Dimethylphthalate	Gas Chromatography/ Mass Spectrometry	8060, 8270 ¹
2-Ethoxyethanol	Gas Chromatography/ Mass Spectrometry	8030, 8240 ¹
Ethylbenzene	Gas Chromatography/ Mass Spectrometry	8020, 8240 ¹

TABLE 3.6.2 (continued)

<u>Parameter</u>	<u>Test Method</u>	<u>Recommended¹ Analytical Method</u>
Formaldehyde	Gas Chromatography/ Mass Spectrometry	8015, 8240 ¹
Isobutyl Alcohol	Gas Chromatography/ Mass Spectrometry	N.S.
Methylene Chloride	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Methyl Ethyl Ketone	Gas Chromatography/ Mass Spectrometry	8015, 8240 ¹
Methyl Isobutyl Ketone	Gas Chromatography/ Mass Spectrometry	8015, 8240 ¹
Napthalene	Gas Chromatography/ Mass Spectrometry	8100, 8270 ¹
2-Nitropropane	Gas Chromatography/ Mass Spectrometry	8030, 8240 ¹
Phenol	Gas Chromatography/ Mass Spectrometry	8040, 8250, 8270 ¹
Polychlorinated Biphenyls	Gas Chromatography/ Mass Spectrometry	8080, 8250 ¹
Pyridine	Gas Chromatography/ Mass Spectrometry	8240, 8270 ¹
Saccharin	N.S.	N.S.
Tetra- chloroethylene	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Toluene	Gas Chromatography/ Mass Spectrometry	8020, 8240 ¹
1,1,1-Trich- loroethane	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Trichloroethylene	Gas Chromatography/ Mass Spectrometry	8010, 8240 ¹
Xylene	Gas Chromatography/ Mass Spectrometry	8020, 8240 ¹

¹ Test Methods for the Evaluation of Solid Waste Physical/
Chemical Methods, EPA, SW-846, 3rd. Edition, November, 1986.

N.S. - Non-Specified in 1.

The floor of the whole building will be decontaminated as described in Section 3.3. Eleven (11) discrete samples will be collected from the areas shown on Figure 5.

A background sample of the concrete will be collected due to the inherent nature of concrete to contain low levels of metals. The background sample will be collected from the outside wall area shown on Figure 5.

The concrete base of the hazardous waste storage area will be sampled in the following manner:

1. Samples of the concrete base will be collected from the areas shown on Figure 4. The samples will be collected by one of the following methods: drilled core sample 0-1", powered jack hammer, or hand chisel.
2. To prevent cross contamination between sampling points, sampling equipment will be decontaminated after each sample by the following:
 - wash with a suitable laboratory soap (alconox);
 - rinse with tap water;
 - rinse with 1:4 solution of nitric acid/distilled water;
 - rinse with distilled water;
 - hexane rinse; and
 - air dry.
3. Samples will be placed into glass containers with a teflon seal and stored on ice.
4. Samples will be submitted to a certified laboratory for analyses accompanied by a signed Chain of Custody (see Appendix D).

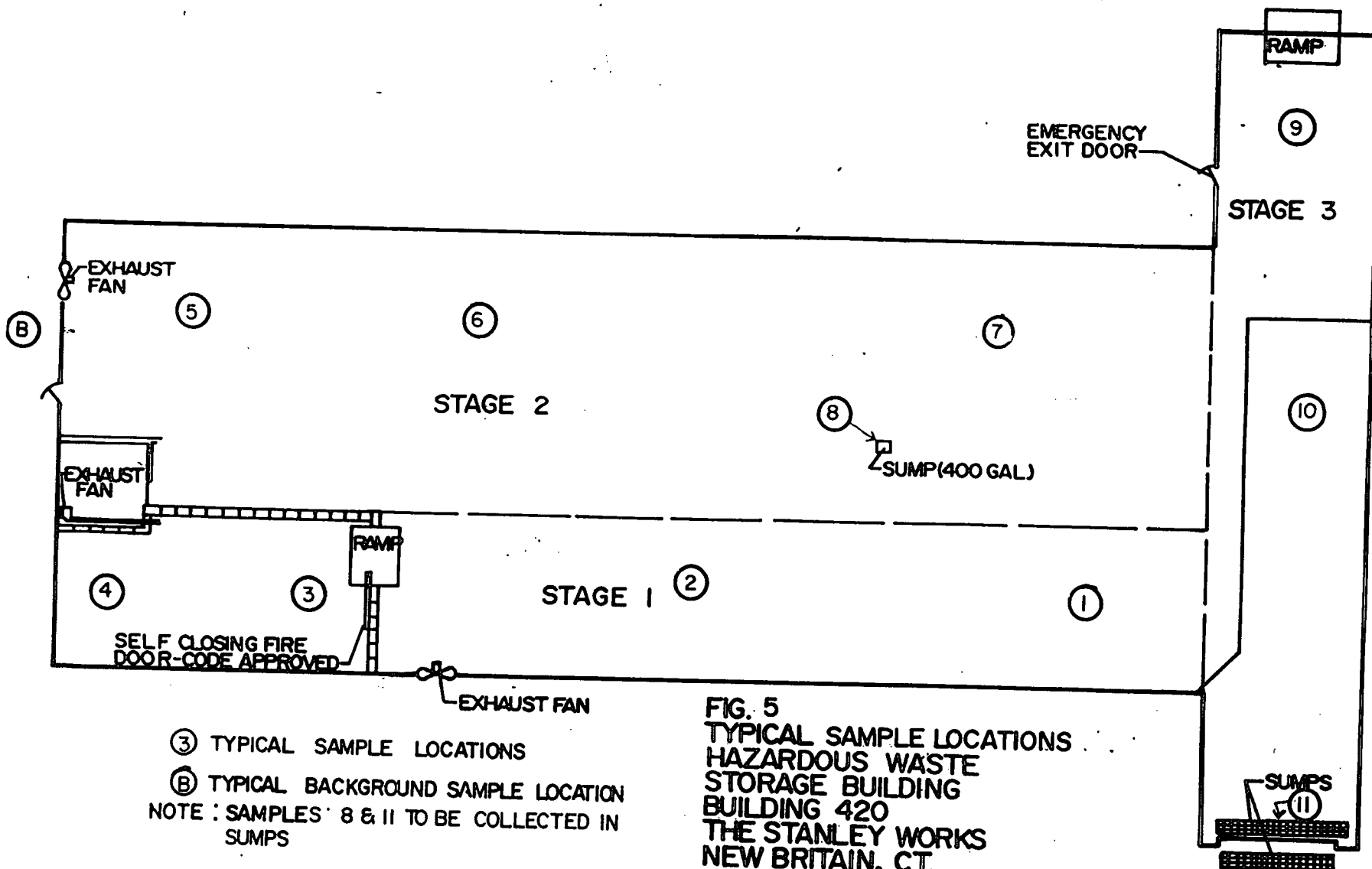


FIG. 5
TYPICAL SAMPLE LOCATIONS
HAZARDOUS WASTE
STORAGE BUILDING
BUILDING 420
THE STANLEY WORKS
NEW BRITAIN, CT.
NTS RC-STN-C
9/88

TABLE 3.6.3

METHODS OF ANALYSIS FOR CONCRETE

The Stanley Works
New Britain, Connecticut

Parameter	Test Method	Recommended ¹ Pretreatment Method	Recommended ¹ Analytical Method
Antimony	Atomic Absorption	1310 ¹	7040, 7041 ¹
Barium	Atomic Absorption	1310 ¹	7080, 7081 ¹
Cadmium	Atomic Absorption	1310 ¹	7130, 7131 ¹
Chromium	Atomic Absorption	1310 ¹	7190, 7191 ¹
Copper	Atomic Absorption	1310 ¹	7210 ¹
Cyanide	Colormetric	---	9010, 9012 ¹
Lead	Atomic Absorption	1310 ¹	7420, 7421 ¹
Mercury	Atomic Absorption	1310 ¹	7470, 7471 ¹
Nickel	Atomic Absorption	1310 ¹	7520 ¹
Selenium	Atomic Absorption	1310 ¹	7740 ¹ , 7741 ¹
Silver	Atomic Absorption	1310 ¹	7760, 7761 ¹
Zinc	Atomic Absorption	1310 ¹	7950 ¹
Benzene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020, 8240 ¹
Chlorobenzene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020, 8240 ¹
1,1,2-Trichloro- 1,2,2-Trifluoro- ethane	Gas Chromatography/ Mass Spectrometry	1311 ²	8010, 8240 ¹
Trichlorofluoro- methane	Gas Chromatography/ Mass Spectrometry	1311 ²	8010, 8240 ¹
Chloroform	Gas Chromatography/ Mass Spectrometry	1311 ²	8010, 8240 ¹
Cresols	Gas Chromatography/ Mass Spectrometry	1311 ²	8040, 8250, 8270 ¹
O-Dichlorobenzene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020, 8240 ¹
M-Dichlorobenzene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020, 8240 ¹
Diethylphthalate	Gas Chromatography/ Mass Spectrometry	1311 ²	8060, 8270 ¹
Dimethylphthalate	Gas Chromatography/ Mass Spectrometry	1311 ²	8060, 8270 ¹
2-Ethoxyethanol	Gas Chromatography/ Mass Spectrometry	1311 ²	8030, 8240 ¹
Ethylbenzene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020, 8240 ¹
Formaldehyde	Gas Chromatography/ Mass Spectrometry	1311 ²	8015, 8240 ¹

TABLE 3.6.3 (continued)

<u>Parameter</u>	<u>Test Method</u>	<u>Recommended¹ Pretreatment Method</u>	<u>Recommended¹ Analytical Method</u>
Isobutyl Alcohol	Gas Chromatography/ Mass Spectrometry	1311 ²	N.S.
Methylene Chloride	Gas Chromatography/ Mass Spectrometry	1311 ²	8010,8240 ¹
Methyl Ethyl Ketone	Gas Chromatography/ Mass Spectrometry	1311 ²	8015,8240 ¹
Methyl Isobutyl Ketone	Gas Chromatography/ Mass Spectrometry	1311 ²	8015,8240 ¹
Napthalene	Gas Chromatography/ Mass Spectrometry	1311 ²	8100,8270 ¹
2-Nitropropane	Gas Chromatography/ Mass Spectrometry	1311 ²	8030,8240 ¹
Phenol	Gas Chromatography/ Mass Spectrometry	1311 ²	8040,8250, 8270 ¹
Polychlorinated Biphenyls	Gas Chromatography/ Mass Spectrometry	1311 ²	8080,8250 ¹
Pyridine	Gas Chromatography/ Mass Spectrometry	1311 ²	8240,8270 ¹
Saccharin	N.S.	1311 ²	N.S.
Tetra- chloroethylene	Gas Chromatography/ Mass Spectrometry	1311 ²	8010,8240 ¹
Toluene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020,8240 ¹
1,1,1-Trich- loroethane	Gas Chromatography/ Mass Spectrometry	1311 ²	8010,8240 ¹
Trichloroethylene	Gas Chromatography/ Mass Spectrometry	1311 ²	8010,8240 ¹
Xylene	Gas Chromatography/ Mass Spectrometry	1311 ²	8020,8240 ¹

¹ Test Methods for the Evaluation of Solid Waste Physical/
Chemical Methods, EPA, SW-846, 3rd. Edition, November, 1986.

² Toxicity Characteristic Leaching Procedure

N.S. - Non-Specified in i.

D. Testing Procedures for Concrete

The testing procedures to be followed by the certified laboratory when analyzing the concrete samples are shown on Table 3.6.3.

The testing procedures to be followed by the certified laboratory when analyzing the background sample are shown on Table 3.6.4.

E. Sampling Procedures of Ambient Air

To protect the health of clean-up personnel, air monitoring will be conducted. Air monitoring for gross organic vapors will be conducted utilizing an H-Nu Organic Vapor Analyzer.

F. Testing Procedures of Ambient Air

The H-Nu Organic Vapor Analyzer yields direct measurements and no laboratory analyses are necessary.

3.7 Closure Performance Determination

The following hierarchies will be used to determine when the hazardous waste storage area satisfies the closure performance standards shown in Table 3.5.1.

TABLE 3.6.4

METHODS OF ANALYSIS FOR BACKGROUND CONCRETE

The Stanley Works
New Britain, Connecticut

<u>Parameter</u>	<u>Test Method</u>	<u>Recommended¹ Pretreatment Method</u>	<u>Recommended Analytical Method</u>
Antimony	Atomic Absorption	1310 ¹	7040, 7041 ¹
Barium	Atomic Absorption	1310 ¹	7080, 7081 ¹
Cadmium	Atomic Absorption	1310 ¹	7130, 7131 ¹
Chromium, Total	Atomic Absorption	1310 ¹	7190, 7191 ¹
Copper	Atomic Absorption	1310 ¹	7210 ¹
Lead	Atomic Absorption	1310 ¹	7420, 7421 ¹
Mercury	Atomic Absorption	1310 ¹	7470, 7471 ¹
Nickel	Atomic Absorption	1310 ¹	7520 ¹
Selenium	Atomic Absorption	1310 ¹	7740, 7741 ¹
Silver	Atomic Absorption	1310 ¹	7760, 7761 ¹
Zinc	Atomic Absorption	1310 ¹	7950 ¹

1. Test Methods for the Evaluation of Solid Waste Physical/Chemical Methods, EPA, SW-846, 3rd Edition, November, 1986.

For organic constituents, the analytical results will be compared to the MCL's, RFD's and RSD's in that order. The MCL will be used as the clean standard when available. If a compound does not have a MCL, the RFD will be used as the clean standard. For tetrachloroethylene (a known carcinogen) the RSD will be used as the clean standard. For organic constituents without a MCL, RFD or RSD, the minimum detection limit for the specific compound for the applicable analytical method will be used as the clean standard.

For metal constituents, a hierarchy which considers background levels must be utilized. Due to the inherent nature of concrete, natural levels of metals may be present. A representative background sample of the concrete will be taken and analyzed as described in Sections 3.6.C and D. The analytical results for metals will be compared to the MCL's and RFD's. In the event that the background level for any metal is higher than the MCL and RFD, the background level will be used as the clean standard. If the background level is less than the MCL, the MCL will be used as the clean standard. If there is not an MCL and the background level is less than the RFD, the RFD will be used as the clean standard.

After the storage area has been decontaminated as described in Section 3.3, a screening sample of the most recent rinse water will be taken and analyzed as described in Section 3.6.A and B.

The laboratory results for the screening sample will be compared to the hierarchy of levels (MCL, RFD, RSD, etc.) as discussed previously. If the screening sample does not meet the specified levels, the decontamination procedure described in Section 3.3 will be repeated. If the results for the screening sample meet the specified levels, the concrete floor will be sampled and analyzed as described in Section 3.6.C and D.

The laboratory results for the concrete will be compared to the hierarchy of levels (MCL, RFD, RSD, background, etc.) as discussed previously.

3.8 Closure Schedule

The year for closure of the hazardous waste storage area is expected to be 1988. The details of the closure schedule for the hazardous waste storage area are shown on Table 3.8.1.

TABLE 3.8.1

CLOSURE SCHEDULE
HAZARDOUS WASTE CONTAINER STORAGE AREA

The Stanley Works
New Britain, Connecticut

<u>Closure Activity</u>	<u>Completion Date</u>
A. Received written approval of closure plan from Connecticut Department of Environmental Protection and Region I Office of the U. S. Environmental Protection Agency.	Day 1
B. Begin final closure of facility	
Decontamination of Storage Area	Within 90 days after receiving written approval of closure plan from Connecticut DEP and US EPA Region I office.
Dispose of rinse water, contaminated clean-up material and contaminated personal protective equipment	Within 120 days after receiving written approval of closure plan from Connecticut DEP and US EPA Region I office.
Certification of Closure	Within 180 days after receiving written approval of closure plan from Connecticut DEP and US EPA Region I office.
<u>Total time for closure</u>	180 days after Closure Activity began including Decontamination and Certification

3.9 Amendment of Closure Plan

The Stanley Works will submit a written request to the Regional Administrator and the Connecticut Department of Environmental Protection to authorize a change to the approved closure plan, if an unexpected event requires a modification of the closure plan during final closure activities. An amendment due to an unexpected event will be requested no later than 30 days after the unexpected event occurs.

3.10 Cost Estimates

Closure costs in Fall, 1988 dollars are shown on Table 3.8.1. These costs are based on the following third party costs for closing the facility.

1. Operator @ \$50/hour
2. Supervisor @ \$75/hour
3. Disposal of wastes at the following rates:
 - Contaminated clean-up and personal protective equipment \$250/drum
 - Decontamination rinse water \$150/drum
4. Waste transportation @ \$300/trip
5. Equipment
 - Basic safety equipment (per person) \$ 75/day
 - Tools \$ 25/day
 - Air Monitoring Equipment \$100/day
 - Pressure Washer \$150/day
6. Professional Engineer @ \$95/hour
7. Laboratory Analysis
 - Rinse water sample \$750
 - Concrete sample \$750

The hazardous waste storage area is undergoing closure so that The Stanley Works may reclassify its New Britain Facility to a Generator of hazardous waste. As a Generator, The Stanley Works will utilize Building 420 for short-term (less than 90 days) storage. At the present time, all wastes are stored for less than ninety (90) days. As such, only the cost of disposal of decontamination/closure generated wastes are included in this estimate.

TABLE 3.10.1

CLOSURE COSTS
HAZARDOUS WASTE STORAGE AREA

The Stanley Works
New Britain, Connecticut

A.	Decontamination of Storage Area	
-	Operators (2) @ 40 hours/each x \$50/hour	\$ 4,000
-	Supervisor @ 40 hours x \$75/hour	\$ 3,000
-	High Pressure Steam Cleaner Rental @ 5 days x \$150/day	\$ 750
-	Safety Equipment & Tools @ \$100/day x 5 days x 3 people	\$ 1,500
-	Laboratory Analysis 18 samples x \$750/sample	\$13,500
B.	Disposal of Decontaminated Rinse Water	
-	Disposal & Transportation of 5 drums	\$ 1,050
C.	Disposal of Contaminated Clean-up and Personal Protective Equipment	
-	Disposal & Transportation of 2 drums	\$ 800
D.	Professional Engineer - Certificate of Closure	
-	8 hours x \$95/hour	<u>\$ 760</u>
	Sub-Total	\$25,360
	Contingency @ 25%	<u>\$ 6,340</u>
	TOTAL	\$31,700
	SAY	<u>\$31,700</u>

3.11 Certification of Closure

Certification at the completion of closure by a Licensed Professional Engineer is required. The following certification will be submitted to the EPA Region I Administrator and the Connecticut Department of Environmental Protection upon completion of closure.

"I, _____, for _____ or _____, a hazardous waste TSDF, and I, _____, P.E., employed by _____ certify by means of signatures, that the facility named above has been closed in accordance with the method specified by the Closure Plan and attached hereto. Closure was completed on _____, after receiving the final volume of material on _____.

_____	_____ P.E.
Company Name	Engineer

_____	_____
Date	Date

APPENDIX A

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
GENERAL		F C T D O 1 0 1 7 0 3 6 3	
LABEL ITEMS		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME			
V. FACILITY MAILING ADDRESS			
VI. FACILITY LOCATION			
PLEASE PLACE LABEL IN THIS SPACE			

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1. THE STANLEY WORKS

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

B. PHONE (area code & number)

2. SPRONG ROBERT MGR UTIL & SVC

203 225 5111

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3. 195 LAKE ST

B. CITY OR TOWN

4. NEW BRITAIN

C. STATE

D. ZIP CODE

CT 06050

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5. 195 LAKE ST

B. COUNTY NAME

HARTFORD

C. CITY OR TOWN

D. STATE & ZIP CODE

E. COUNTY CODE

NEW BRITAIN

CONTINUED FROM THE FRONT

A. FIRST		B. SECOND	
3 4 2 3 (specify)	HAND TOOLS	7 3 4 2 9 (specify)	BUILDERS HARDWARE
C. THIRD		D. FOURTH	
3 3 1 6 (specify)	COLD ROLLED STEEL	7 3 4 9 9 (specify)	FLAT METAL STRAPPING

OPERATOR INFORMATION	
A. NAME	B. Is the name listed in Item VIII-A also the owner?
THE STANLEY WORKS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)	
F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify) P	D. PHONE (area code & no.)
	2 0 3 2 2 5 5 1 1 1
E. STREET OR P.O. BOX	
9 5 LAKE ST	
F. CITY OR TOWN	G. STATE
NEW BRITAIN	CT
H. ZIP CODE	IX. INDIAN LAND
0 6 0 5 0	Is the facility located on Indian lands?
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

EXISTING ENVIRONMENTAL PERMITS	
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
CT 0 0 0 1 1 4 7	9 P
E. OTHER (specify)	
F. UIC (Underground Injection of Fluids)	
9	
G. RCRA (Hazardous Wastes)	
9	

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Manufacturing hand tools, builders hardware, industrial hardware, cold rolled steel, strapping systems.

II. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED

REMARKS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM
3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER

F C T D O 1 0 1 7 0 3 6 3 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)
23	24 25 26 27 28 29

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

(Manufacturing at this site since 1843)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
1	S 0 2	600	G		5				
2	T 0 3	20	E		6				
1	S 0 1	75,000	G		7				
2	T 0 1	634,000	E		8				
3					9				
4					10				

continued from the front.

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE

CODE

POUNDS P

TONS T

METRIC UNIT OF MEASURE

CODE

KILOGRAMS K

METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. **PROCESS CODES** — For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item 1(f) to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item 1(f) to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous waste(s) that possess that characteristic or toxic contaminant.
Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

E: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 - In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

SAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds/year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
K 0 5 4	900	P	T 0 3 D 8 0	
D 0 0 2	400	P	T 0 3 D 8 0	
D 0 0 1	100	P	T 0 3 D 8 0	
D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 25 wastes to list.

FORM APPROVED OMB NO. 156-580004																																																							
OFFICIAL USE ONLY																																																							
<table border="1"> <tr> <td>W</td><td>C</td><td>T</td><td>D</td><td>0</td><td>1</td><td>0</td><td>1</td><td>7</td><td>0</td><td>3</td><td>6</td><td>3</td> <td>T/A</td><td>C</td> </tr> <tr> <td colspan="13"></td> <td>1</td> </tr> <tr> <td colspan="13"></td> <td>13 14 15</td> </tr> </table>													W	C	T	D	0	1	0	1	7	0	3	6	3	T/A	C														1														13 14 15
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continued from the front.

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

T/A C
6

FACILITY DRAWING

existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

1. PHOTOGRAPHS

existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

2. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 40 12

LONGITUDE (degrees, minutes, & seconds)

72 47 55

3. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V.E.W.

11/17/80

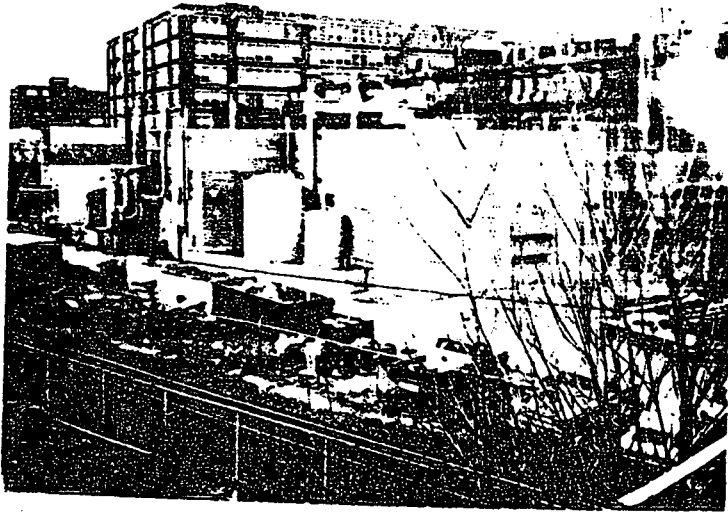
OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

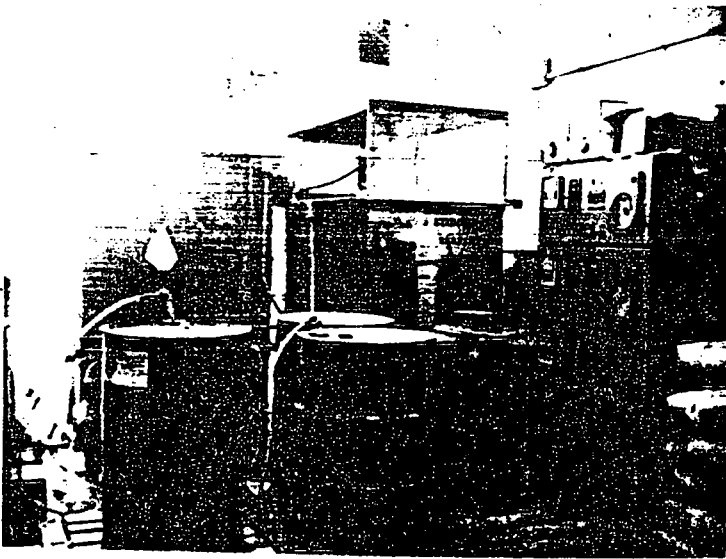
C. DATE SIGNED



BLOG. 30

HARDWARE WASTE TREATMENT

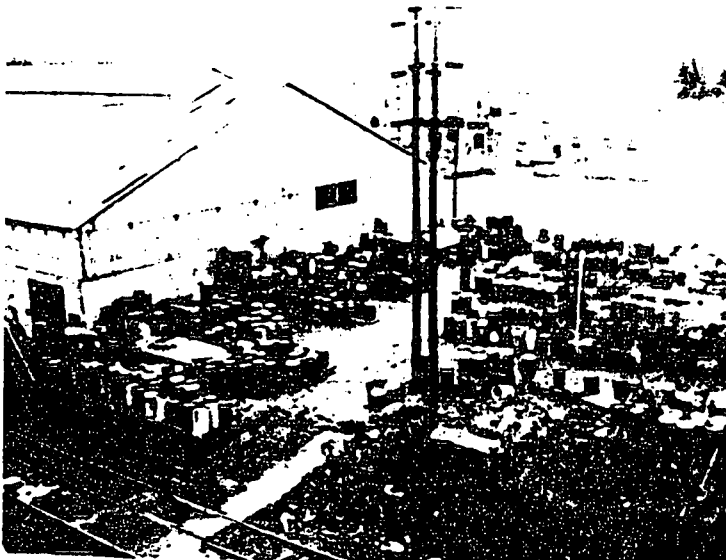
11/14/80



BLOG. 431

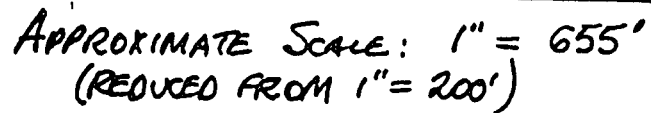
TOOLS WASTE TREATMENT

11/14/80



DRUM STORAGE AREA

11/14/80



APPENDIX B

STANLEY

T H E S T A N L E Y W O R K S

Since 1843

NEW BRITAIN, CONNECTICUT 06050

(203) 225-5111

September 3, 1982

Mr. Barry Giroux
Hazardous Waste Management Section
Department of Environmental Protection
State Office Building
Hartford, CT 06115

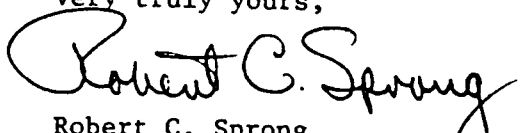
Dear Mr. Giroux:

We filed Part A of an application for a hazardous waste permit in November, 1980. Described in the application were treatment processes which meet the definitions of "elementary neutralization unit" and "wastewater treatment unit", as effective November 19, 1980, and should therefore be excluded from application of the Part 264 Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities. The processes consist of treatment of metal finishing wastes in tanks, under the provisions of State water compliance orders.

We would like to amend our original permit application to eliminate treatment processes, leaving only container storage. Please let me know what further steps we must take to accomplish this amendment.

Our EPA I.D. Number is CTD010170363.

Very truly yours,


Robert C. Sprong
Manager, Utilities & Services

jat

CC: G. Reitwiesner
W. Shwayka
L. Soucy
D. Yarema

APPENDIX C

(Rec'd 1/5/84 (Postmarked 1/4/84))
FCS

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Copies - W.C. Bauer
R.A. MacFarlane
D.M. Yonema
P. Kilduff

E.E. Carrinani

MATTER OF AN ORDER TO THE STANLEY WORKS TO ABATE

ORDER

Having found that The Stanley Works, located at 195 Lake Street, in New Britain, Connecticut, is in violation of Connecticut's Hazardous Waste Management Regulations and is maintaining a facility or condition which can reasonably be expected to create a source of pollution to the waters of the State of Connecticut, under the provisions of Chapter 446K of the Connecticut General Statutes as amended the Commissioner of the Department of Environmental Protection acting under Sections 22a-6, 22a-432, and 22a-449 of the General Statutes, hereby orders The Stanley Works to take such action as is necessary to:

1. Immediately cease the leakage, spillage, or other release of hazardous and toxic waste into the environment.
2. Bring all waste handling procedures into compliance with the State Hazardous Waste Management Regulations.
3. Obtain financial assurance and liability insurance mechanisms for closure of the hazardous waste facility in accordance with all applicable state regulations.
4. Define the extent and degree of on-site contamination.
5. Effect the removal and disposal of all toxic or hazardous wastes stored improperly on-site in a manner approved by the Commissioner of the Department of Environmental Protection.
6. Close the old container storage area located behind buildings 400 and 401.

The Stanley Works is further ordered to accomplish the above described program, except as may be revised by the Commissioner of the Department of Environmental Protection, in accordance with the following schedule:

- A. On or before January 31, 1984, verify to the Commissioner of the Department of Environmental Protection that Directive 1 has been complied with.

- B. On or before January 31, 1984, verify to the Commissioner of the Department of Environmental Protection that the services of a qualified consultant have been retained to prepare the reports required in Steps C, H, J, L.
- ✓ C. On or before March 31, 1984, submit to the Commissioner of the Department of Environmental Protection for review and approval a report that details the remedial measures necessary to achieve compliance with all Connecticut Hazardous Waste Management Regulations in accordance with Directive 2, including an inspection schedule and log, personnel training records, a contingency plan, operating records, and plans and specifications for a new storage area.
- ✓ D. On or before May 31, 1984, verify to the Commissioner of the Department of Environmental Protection that construction of the new storage area, approved under Step C, has been initiated.
- ✓ E. On or before August 31, 1984, verify to the Commissioner of the Department of Environmental Protection that construction of the storage area approved under Step C has been completed.
- ✓ F. On or before July 31, 1984, verify to the Commissioner of the Department of Environmental Protection that all remedial measures approved under Step C have been implemented.
- ✓ G. On or before February 29, 1984, submit to the Commissioner of the Department of Environmental Protection unexecuted copies of all financial requirements as required in accordance with Directive 3.
- ✓ H. On or before March 31, 1984, submit to the Commissioner of the Department of Environmental Protection executed copies of all the financial requirements approved in accordance with Step G.
- ✓ I. On or before April 30, 1984, submit a detailed report which outlines a sampling program that includes sampling locations, procedures, and analytical tests to be performed to determine the extent and degree of on-site soil contamination in accordance with Directive 4.
- ✓ J. On or before July 31, 1984, submit the final report and analytical results in accordance with the report approved under Step I including recommendations on the necessity of a groundwater monitoring program to further define the degree and extent of contamination.

ee
o. HM-72

- . On or before March 31, 1984, submit to the Commissioner of the Department of Environmental Protection for review and approval a detailed report which includes: an inventory and hazardous waste determination for all wastes (including waste oils and PCBs) stored on-site, an identification of all past waste disposal (including spillage or leakage) practices, procedures, and locations, and an implementation schedule to be executed by a Connecticut permitted waste disposal firm for the proper repackaging as required, transportation, and disposal of hazardous wastes in accordance with Directive 5.
- ✓ L. On or before June 31, 1984, verify to the Commissioner of the Department of Environmental Protection that all wastes stored improperly on-site have been removed in accordance with the procedures approved in accordance with Step K.
- ✓ M. On or before March 31, 1984, submit to the Commissioner of the Department of Environmental Protection for review and approval a closure plan for the old container storage area behind buildings 400 and 401, in accordance with Directive 6.
- . N. On or before July 31, 1984, verify to the Commissioner of the Department of Environmental Protection that the old storage area has been closed in accordance with the report approved under Step M.

Entered as an Order of the Commissioner of Environmental Protection the 29th day of December 1983.

Stanley J. Pac
Stanley J. Pac
Commissioner

Order No. HM-72
City of New Britain

Sent Certified Mail
Return Receipt Requested

APPENDIX D

CHAIN OF CUSTODY RECORD

Place & Address Of Collection					Samplers Name (Signature)														
					Assistant(Witness)(Signature)														
					Job Number														
Sample Number	Sample Location	Type Container	Total Volume	Preservative	Date	Time	Sample Type Water Soil Air Waste				Remarks								
Relinquished By (Signature)				Received By (Signature)				Date		Time									
Relinquished By (Signature)				Received By (Signature)				Date		Time									
Relinquished By (Signature)				Received By (Signature)				Date		Time									
Name & Address Of Laboratory																			
ANALYSIS REQUIRED SAMPLE IDENTIFICATION																			
Parameters		Sample Number								Parameters		Sample Number							
Al										NO ₂ -N									
As										(Ortho) PO ₄ -P									
Ba										(Total) PO ₄ -P									
Ca										Oil & Grease									
Cd										Phenols									
Cr ⁺⁶										CN ⁻ -A									
Cr ^{-T}										CN ⁻ -T									
Cu										TKN									
Fe-D										Organic -N									
Fe-T										TOC									
Pb										pH									
Mg										STD Water									
Mn-D										Fecal Coliform									
Mn-T										Fecal Strep.									
Na										Total Coliform									
Hg										Flouride									
NI										Chloride									
Ag										8010									
Se										8020									
V-										8080									
Zn										8015									
TSS										TOX									
TDS																			
TS																			
Sp Cond.																			
NO ₃ -N																			
Remarks																			